

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA
ERIE DIVISION

WILLIAM H. STEINBRINK, M.D. and)	
PATRICIA M. STEINBRINK, his wife,)	
)	
and)	
)	
BAYSIDE OBSTETRICS GYNECOLOGY)	
INFERTILITY, INC. 401(k) PROFIT)	
SHARING PLAN,)	
)	
Plaintiffs)	
)	
v.)	CASE NO. CA 01-382 - Erie
)	
ROTHSTEIN, KASS & COMPANY, P.C.;)	Filed Electronically
B. HAUPTMAN & ASSOCIATES, LLC;)	
BRUCE A. HAUPTMAN,)	
)	
Defendants)	
)	
)	

MOTION FOR EXTENSION OF TIME IN WHICH TO
FILE AMENDED COMPLAINT

AND NOW, come the above named plaintiffs, William H. Steinbrink, Patricia M. Steinbrink and Bayside Obstetrics Gynecology Infertility, Inc. 401(k) Profit Sharing Plan, by their counsel, AMBROSE, FRIEDMAN and WEICHLER, and respectfully file the following Motion for Extension of Time in Which to File Amended Complaint:

1. On July 26, 2006, this Honorable Court entered an Order relative to various motions filed by the defendants directing that plaintiffs file their amended complaint in accordance with the Court's Opinion and Order no later than September 1, 2006.

2. Plaintiffs' counsel, Leonard G. Ambrose III, has been involved in preparation for several complex criminal cases, one of which is scheduled for trial in September, 2006.

3. Plaintiffs' counsel has consulted with counsel for Rothstein, Kass and Company, P.C., Joel M. Wolosky, Esquire, and with counsel for B. Hauptman & Associates and Bruce A. Hauptman, Linda Stadler, Esquire, and both have consented to plaintiffs' request.

WHEREFORE, plaintiffs respectfully request an Order of this Court granting them an extension until October 1, 2006 in which to file their amended complaint.

Respectfully submitted,

AMBROSE, FRIEDMAN and WEICHLER

s/Leonard G. Ambrose, III, Esquire

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